

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

SIRIUS TECHNOLOGY ADVANCED
RESEARCH, LLC; and STAR
UNACKNOWLEDGED, LLC;

Case No. 1:23-cv-09560-DEH

Plaintiffs,
v.

CHICKEN SOUP FOR THE SOUL
ENTERTAINMENT, INC.;
TOFG, LLC/d.b.a. 1091 PICTURES; and DOES
1-10
Defendants.

PLAINTIFFS' MOTION FOR ADMISSION PRO HAC VICE

COMES NOW, attorney for Plaintiffs, Law Office of Derek V. Garcia, LLC (Derek Garcia, Esq.), pursuant to Local Civil Rule 1.3 (c), and hereby respectfully requests Admission to the Court *pro hac vice*. Plaintiff requests Entry of Appearance on behalf of Plaintiffs SIRIUS TECHNOLOGY ADVANCED RESEARCH, LLC; and STAR UNACKNOWLEDGED, LLC.

STANDARD OF REVIEW

“(c) A member in good standing of the bar of any state or of any United States District Court may be permitted to argue or try a particular case in whole or in part as counsel or advocate, upon motion as described below.” Local Civil Rule 1.3(c).

ARGUMENT

Plaintiffs' Applicant Attorney is a Member of the Federal Bar in Good Standing in the State of New Mexico, the United States District Court for the District of New Mexico, the United States Court of Appeals for the Tenth Circuit, and United States Supreme Court. As required by Local Civil Rule 1.3(c), Plaintiff attaches an Affidavit certifying compliance with the admission

requirements of the United States District Court for the Southern District of New York. *See* (**Exh. A**, Affidavit of Derek V. Garcia, Esq.). Applicant again here certifies the truth and accuracy of the following: 1) Derek Garcia, Esq. has never been convicted of a felony, (2) Derek Garcia, Esq., has never been censured, suspended, disbarred or denied admission or readmission by any court, and (3) there are no disciplinary proceedings presently against the Applicant, Derek Garcia, Esq. Plaintiff attaches an updated Certificate of Good Standing issued from the Supreme Court of New Mexico. *See* Certificate of Good Standing, issued December 8, 2023 (**Exh. B**).

RELIEF REQUESTED

WHEREFORE, for the foregoing reasons, Applicant should be Admitted to the Court and permitted Entry of Appearance on behalf of Plaintiffs, SIRIUS TECHNOLOGY ADVANCED RESEARCH, LLC; and STAR UNACKNOWLEDGED, LLC, and for such additional and further relief deemed justified and necessary by the Court. Applicant has attached a proposed Order, attached to the Motion itself pursuant to Notice of Deficiency filed December 1, 2023.

Respectfully submitted,

Derek Garcia

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*Pending Motion for Admission Pro Hac Vice
Attorney for Plaintiffs*

CERTIFICATE OF SERVICE

/s/ Derek Garcia

This is to certify that on this 8TH day of December, 2023, the foregoing **Motion for Pro Hac Vice Admission** was filed

electronically through the CM/ECF system,
with additional copies served by **Email** to the
following:

Caryn L. Marcus
Special Counsel
Graubard Miller
The Chrysler Building
405 Lexington Avenue - 44th Floor
New York, New York 10174-4499
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Attorneys for Defendants:

CHICKEN SOUP FOR THE SOULENTERTAINMENT, INC.
TOFG, LLC/d.b.a. 1091 PICTURES

Application **GRANTED**. So Ordered. The Clerk of Court is
respectfully directed to close the motion at Dkt. No. 20.

A handwritten signature in black ink, appearing to read "Dale Ho", with a stylized flourish at the end.

Dale E. Ho
United States District Judge
Dated: December 11, 2023
New York, New York